

EXHIBIT “B”

DOCUMENT REQUESTS

Please produce:

1. All documents relied upon by the deponent in preparing for this deposition.
2. All complaints and reports received by Defendants during the Relevant Time Period for TVT reporting particles or foreign material in the product or packaging.
3. All correspondence sent by Defendants to healthcare providers or received by Defendants from healthcare providers during the Relevant Time Period regarding reports of particles or foreign material in TVT packaging or product, including any correspondence indicating whether or not TVT products are safe to use despite particles or foreign material being present in the product or packaging.
4. All communications by Defendants discussing the cost involved with any potential recall action of any TVT lot number(s), including any discussions regarding lost sales or lost goodwill as a result of any potential action to recall or reclaim any TVT products.
5. Any documents reflecting analyses performed by Defendants to determine the cost involved with any potential recall action of any TVT lot number(s), including any analyses performed by Defendants discussing lost sales or lost goodwill as a result of any potential action to recall or reclaim any TVT products.
6. Any scientific or medical analyses performed by Defendants on potential patient consequences of particles or foreign matter in TVT products or packaging.
7. All communications regarding any scientific or medical analyses performed by Defendants on potential patient consequences of particles or foreign matter in TVT products or packaging.

8. All communications between Defendants' employees regarding the 10 returned TVT-O products described in exhibit A-4.

9. All communications between Defendants and third parties regarding the 10 returned TVT-O products described in exhibit A-4.

10. Any documents reflecting analyses or testing by Defendants on the 10 returned TVT-O products described in exhibit A-4.

11. Any operating procedures, standards, worksheets, or specifications used by Defendants during the Relevant Time Period for acceptance or rejection of TVT product based on particles or foreign material in the product or packaging, including but not limited to: TM403-166, EMQD10, VSE0007, C/L-E0038, and TAPPI 213/T437 including all historical versions of such procedures and standards and dates of use for each procedure, standard, or specification.

12. All communications between Defendants' employees during the Relevant Time Period regarding changes to operating procedures, standards, worksheets, or specifications used by Defendants for acceptance or rejection of TVT product based on particles or foreign material in the product or packaging including but not limited to: TM403-166, EMQD10, VSE0007, C/L-E0038, and TAPPI 213/T437.

13. All documents maintained by defendants reflecting inspections, acceptance, and rejections of TVT products based on Defendants' specifications and operating procedures during the Relevant Time Period.

14. All documents reflecting investigation, analyses, conclusions, and corrective and preventative actions regarding particles or foreign material in products or packaging of TVT products during the Relevant Time Period.

15. All communications regarding investigation, analyses, conclusions, and corrective and preventative actions regarding particles or foreign material in products or packaging of TVT products during the Relevant Time Period.

16. All documentation regarding returned TVT complaint samples, including but not limited to: testing and analyses of returned samples, and documents reflecting receipt, storage, or disposal of said samples.

17. All documents maintained by defendants reflecting inspections, maintenance, and cleaning of equipment used by Defendants for cutting TVT mesh, packaging TVT, or sterilization of TVT during the Relevant Time Period.

18. All documents maintained by defendants reflecting cleaning and inspection of manufacturing areas used by Defendants for cutting TVT mesh, packaging TVT, or sterilization of TVT during the Relevant Time Period.